



VIRGINIA  
& AMBINDER LLP  
Attorneys at Law

Application GRANTED. The Clerk of Court  
is directed to terminate ECF No. 14.

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New York, New York 10004  
Telephone: (212) 943-9080

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Maura Moosnick', with the date 'December 9, 2024' written below it.

**Maura Moosnick, Esq.**  
Partner  
[mmoosnick@vandallp.com](mailto:mmoosnick@vandallp.com)

December 9, 2024

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**VIA ECF**

Hon. Jesse M. Furman, U.S.D.J.  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**RE:** *Trustees of the New York City District Council of Carpenters  
Pension Fund, et al., v. Sunny Acres Landscaping Inc. 24-CV-8117 (JMF)*

Dear Judge Furman:

This firm represents the Petitioners in the above-referenced action. We write to request a 60-day extension in connection with the Court's October 29, 2024 Order (ECF Doc. No. 8) which, *inter alia*, required the Respondent in this case to file their opposition by December 10, 2024. The Petitioners' reply, if any, is due on December 17, 2024.

The parties have engaged in settlement discussions and Respondent has produced limited records for a payroll audit to be performed, subject to trustee approval. The Trustees next meet on February 4, 2025, with any settlement recommendations to be submitted by January 20, 2025.

Respondent is a Maryland-based corporation and has counsel that is admitted to practice law in Maryland. In light of the parties' settlement discussions and development of a potential resolution (subject to additional compliance and trustee approval), the parties respectfully request a 60-day extension of the briefing schedule in this matter, with Respondent's opposition to be due on February 10, 2025 and the Petitioners' reply to be due on February 17, 2025. This extension will allow the parties to continue making progress toward settlement, and will allow time for Respondent's Maryland-based counsel to obtain *proc hac vice* admission or to have Respondent retain New York local counsel if the parties are unable to agree upon a settlement in principal by mid-January 2025.

We thank the Court for its time and attention to this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Maura Moosnick', with the name 'Maura Moosnick, Esq.' printed below it.

Maura Moosnick, Esq.

cc: Timothy Talbot, Esq. (via Electronic Mail)